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ALEXANDER L. STEVAS,
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IN THE

SUPREME COURT OF THE UNITED STATES

October Term, 1982

No. 82-287

STATE OF ARIZONA, et al.,

Petitioners,

vs.

ASH GROVE CEMENT COMPANY, et al.,

Respondents.

PETITIONERS' REPLY MEMORANDUM IN SUPPORT OF "MOTION FOR RELIEF FROM COMPLIANCE WITH CERTAIN PROVISIONS OF SUPREME COURT RULES 19.3, 21.1(b), 28.1 and 28.3"

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PETITIONERS' REPLY MEMORANDUM IN SUPPORT OF "MOTION FOR RELIEF FROM COMPLIANCE WITH CERTAIN PROVISIONS OF SUPREME COURT RULES 19.3, 21.1(D), 28.1 and 28.3"

The pending Petition for a Writ of Certiorari involves the appealability of an order holding that absent members of a certified Rule 23, F.R.Civ.Pro., class are "parties" to the litigation for purposes of 28 U.S.C. § 455(b)(4). Petitioners' present motion seeks relief from overwhelming expenses and logistical burdens which might be imposed by a literal reading of Supreme Court Rules 19.3, 21.1(b), 28.1 and 28.3 if such rules were applied consistent with the ruling below on the merits of the recusal (i.e., Chief District Judge C. A. Muecke's May 26, 1981 Opinion and Order holding that absent class members are "parties" to this litigation for purposes of 28 U.S.C. § 455(b)(4)). Absent the relief requested, Petitioners arguably would be required to serve their Petition on the more than 210,000 class members whose names appear on the Master Class List (filed as Exhibit A to the present motion), and incur extraordinary other expenses in prosecuting the present Petition before this Court.[1] Such an absurd result could hardly have been contemplated by this Court's Rules.

Respondents do not oppose the "technical" relief which Petitioners seek in paragraphs (1)-(3) of their motion,

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[1] In addition to costs of printing and mailing copies of the pending Petition for Writ of Certiorari, merely copying the list of "parties" in its present (reduced type) form for dissemination to each of the 210,235 putative class members on the Master Class List would require in excess of 282,000,000 pieces of paper (copied on both sides). At a rate of $.02 per page, duplicating costs involved in serving this list of "parties" on each of the absent class members (as potentially required by Supreme Court Rule 28.3) would exceed $11,289,000, and first class postage costs would exceed $4,000,000.

but fail to respond to the essence of the present quandry: for this Court to even consider and rule on this unopposed "technical" motion, it must first determine that it has the necessary quorum of six Justices, as required by 28 U.S.C. § 1. This preliminary determination of a quorum itself requires that the individual Justices decide the underlying merits of the recusal issue. To determine the presence (or absence) of a quorum of this Court, it must first decide whether ownership of stock in absent class members by the Chief Justice and Justices Powell, Blackmun, Rehnquist and O'Connor[2] mandates their disqualification pursuant to 28 U.S.C. § 455(b)(4). If absent class members are "parties" for purposes of 28 U.S.C. § 455, then no quorum exists to even consider, much less grant or deny, the present motion.

While certain of the respondents have previously attempted to avoid consideration of the merits of the recusal issue by this Court,[3] the issue is now squarely presented by the present motion for relief from certain provisions of Supreme Court Rules 19.3, 21.1(b), 28.1 and 28.3. The fact that a petition for a writ of mandamus from Chief Judge Muecke's recusal order is currently before the Ninth Circuit Court of Appeals does not detract from the necessity that, before this Court considers this motion and the pending Petition for Writ of Certiorari, it must initially determine that it has a quorum.

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[2] As set forth in their respective Financial Disclosure Reports, current as of December 31, 1981.

[3] See, Alpha Portland Industries, Inc. v. California, ___ U.S. ___, 102 S.Ct. 17 (1981), dismissing Petition for Writ of Certiorari pursuant to Supreme Court Rule 53.2.

Accordingly, Petitioners have moved in the alternative that this Court decide the parameters of the term "parties" (for purposes of both the Supreme Court Rules and 28 U.S.C. § 455) in ruling on the present motion. If this Court believes that the present record is insufficient to address the issue of whether absent class members are "parties" for purposes of 28 U.S.C. § 455, Petitioners respectfully submit that the proper course would be for the Court to direct full briefing on the merits of the recusal issue prior to any determination of the present motion.

DATED: September 8, 1982.

Respectfully submitted,

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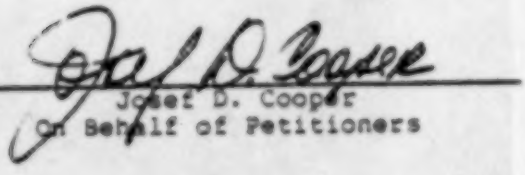
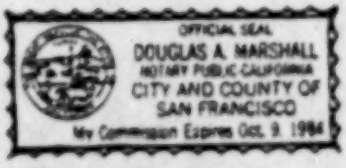
By 
Josef D. Cooper
On Behalf of Petitioners

PROOF OF MAILING - AFFIDAVIT

I, Josef D. Cooper, one of the attorneys for Petitioners herein, and a member of the Bar of the Supreme Court of the United States, hereby certify that, on the 8th day of September, 1982, I deposited in a United States Postal Service mailbox, located at California and Montgomery Streets, San Francisco, California, with first-class postage prepaid, and properly addressed to the Clerk of the Supreme Court of the United States, 40 copies of the foregoing "Petitioners' Reply Memorandum in Support of 'Motion for Relief from Compliance with Certain Provisions of Supreme Court Rules 19.3, 21.1(b), 28.1 and 28.3.'"

Josef D. Cooper

Subscribed and sworn to before me,
at San Francisco, California this
8th day of September, 1982.



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Proof of Service - Certificate by Bar Member

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I, Josef D. Cooper, one of the attorneys for Petitioners herein, and a member of the Bar of the Supreme Court of the United States, hereby certify that, on the 8th day of September, 1982, one copy of the enclosed "Petitioners' Reply Memorandum in Support of 'Motion for Relief from Compliance with Certain Provisions of Supreme Court Rules 19.3, 21.1(b), 28.1 and 28.3'" was served by first-class mail, postage prepaid, on all counsel for Respondents, Petitioners and class members who have entered an appearance through their own counsel, as set forth on the attached Exhibit A. I certify that all parties required to be served in keeping with normal practice before the Supreme Court (i.e., excluding absent members of a class certified under Rule 23, Federal Rules of Civil Procedure) have been served.

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